EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 1. Registration Information

Source Identification

Facility Name: Shamrock AS/RS Warehouse Distribution Center

Parent Company #1 Name: Shamrock Foods Company

Parent Company #2 Name:

Submission and Acceptance

Submission Type: Re-submission

Subsequent RMP Submission Reason: 5-year update (40 CFR 68.190(b)(1))

Description:

Receipt Date: 08-Jul-2009 Postmark Date: 08-Jul-2009 Next Due Date: 08-Jul-2014 Completeness Check Date: 12-Aug-2011 Yes

Complete RMP:

De-Registration / Closed Reason:

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registered / Closed Effective Date:

Certification Received: Yes

Facility Identification

EPA Facility Identifier: 1000 0004 3106 Other EPA Systems Facility ID: AZD982487902

Dun and Bradstreet Numbers (DUNS)

Facility DUNS: 42370734

Parent Company #1 DUNS: Parent Company #2 DUNS:

Facility Location Address

Street 1: 2929 West Virginia Avenue

Street 2:

City: Phoenix State: **ARIZONA** ZIP: 85009

ZIP4:

County: **MARICOPA**

Facility Latitude and Longitude

Latitude (decimal): 33.476610 Longitude (decimal): -112.121979

Interpolation - Digital map source (TIGER) Lat/Long Method:

Lat/Long Description: Plant Entrance (General)

Horizontal Accuracy Measure:

Horizontal Reference Datum Name: World Geodetic System of 1984

Source Map Scale Number:

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Owner or Operator

Operator Name: McClelland Family Trust

Operator Phone: (602) 477-6400

Mailing Address

Operator Street 1: 2228 North Black Canyon

Operator Street 2:

Operator City: Phoenix
Operator State: ARIZONA
Operator ZIP: 85009
Operator ZIP4: 1612

Operator Foreign State or Province:

Operator Foreign ZIP: Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person: John Colligan

RMP Title of Person or Position: S.B.P.I. & Compliance Manager RMP E-mail Address: john_colligan@shamrockfoods.com

Emergency Contact

Emergency Contact Name: Brian G. Hellmann
Emergency Contact Title: Maintenance Manager
Emergency Contact Phone: (602) 477-6214
Emergency Contact 24-Hour Phone: (602) 290-7303

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address: brian_hellmann@shamrockfoods.com

Other Points of Contact

Facility or Parent Company E-mail Address: john_colligan@shamrockfoods.com

Facility Public Contact Phone: (602) 763-3294

Facility or Parent Company WWW Homepage www.shamrockfoods.com

Address:

Local Emergency Planning Committee

LEPC: Maricopa County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site: 946

FTE Claimed as CBI:

Covered By

OSHA PSM: Yes EPCRA 302: Yes

CAA Title V:

Air Operating Permit ID:

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External

Agency:

01-Dec-2008

Fire Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name: Hal D. Rosen, CHMM of Envirosure Solutions, LLC

Preparer Phone: (480) 784-4621

Preparer Street 1: 1979 e Broadway Road

Preparer Street 2:

Preparer City:TempePreparer State:ARIZONAPreparer ZIP:85282

Preparer ZIP4:

Preparer Foreign State: Preparer Foreign Country: Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided: Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine

if there were any accidents reported for this RMP.

Process Chemicals

Process ID: 1000010803

Description: HiRise, Deli, Encanto

Process Chemical ID: 1000012303

Program Level: Program Level 3 process
Chemical Name: Ammonia (anhydrous)

CAS Number: 7664-41-7

Quantity (lbs): 65390

CBI Claimed:

Flammable/Toxic: Toxic

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Process NAICS

Process ID: 1000010803
Process NAICS ID: 1000011178

Program Level: Program Level 3 process

NAICS Code: 49312

NAICS Description: Refrigerated Warehousing and Storage

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000009139

Percent Weight:

Physical State: Gas liquified by refrigeration Model Used: EPA's RMP*Comp(TM)

Release Duration (mins): 10
Wind Speed (m/sec): 1.5
Atmospheric Stability Class: F
Topography: Urban

Passive Mitigation Considered

Dikes:

Enclosures: Yes

Berms:
Drains:
Sumps:
Other Type:

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000010018

Percent Weight:

Physical State: Gas liquified by refrigeration Model Used: EPA's RMP*Comp(TM)

Wind Speed (m/sec): 3.0
Atmospheric Stability Class: D
Topography: Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:

Flares: Scrubbers:

Emergency Shutdown:

Other Type:

Yes

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 4. Flammables: Worst Case

No records found.

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 5. Flammables: Alternative Release

No records found.

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 6. Accident History

Accident History ID: 1000006999

Date of Accident: 28-Jul-1999
Time Accident Began (HHMM): 1507
NAICS Code of Process Involved: 49312

NAICS Description: Refrigerated Warehousing and Storage

Release Duration: 000 Hours 30 Minutes

Release Event

Gas Release: Yes

Liquid Spill/Evaporation:

Fire: Explosion:

Uncontrolled/Runaway Reaction:

Release Source

Storage Vessel:

Piping:

Process Vessel: Transfer Hose:

Valve: Pump: Joint:

Other Release Source:

Yes

Weather Conditions at the Time of Event

 Wind Speed:
 9.2

 Units:
 miles/h

 Direction:
 W

 Temperature:
 84

Atmospheric Stability Class: Precipitation Present:

Unknown Weather Conditions:

On-Site Impacts

Employee or Contractor Deaths:

Public Responder Deaths:

O Public Deaths:

Employee or Contractor Injuries:

O Public Responder Injuries:

O Public Injuries:

O On-Site Property Damage (\$):

Known Off-Site Impacts

Deaths: 0
Hospitalization: 0
Other Medical Treatments: 0
Evacuated: 0

Facility Name: Shamrock AS/RS Warehouse Distribution Center EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220 0 Sheltered-in-Place: 0 Off-Site Property Damage (\$): **Environmental Damage** Fish or Animal Kills: Tree, Lawn, Shrub, or Crop Damage: Water Contamination: Soil Contamination: Other Environmental Damage: **Initiating Event** Initiating Event: **Equipment Failure Contributing Factors** Equipment Failure: Yes Human Error: Improper Procedures: Overpressurization: **Upset Condition:** By-Pass Condition: Maintenance Activity/Inactivity: Process Design Failure: Unsuitable Equipment: **Unusual Weather Condition:** Management Error: Other Contributing Factor: Off-Site Responders Notified Off-Site Responders Notified: Notified and Responded Changes Introduced as a Result of the Accident Improved or Upgraded Equipment: Revised Maintenance: **Revised Training: Revised Operating Procedures:** New Process Controls: New Mitigation Systems: Revised Emergency Response Plan: Changed Process: Reduced Inventory: Other Changes Introduced: Replaced gasket that failed. Confidential Business Information CBI Claimed: Chemicals in Accident History

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Accident Chemical ID: 1000005607

Quantity Released (lbs): 75
Percent Weight: 100.0

Chemical Name: Ammonia (anhydrous)

CAS Number: 7664-41-7 Flammable/Toxic: Toxic

Accident History ID: 10190

Date of Accident: 27-Mar-2011
Time Accident Began (HHMM): 0808
NAICS Code of Process Involved: 49312

NAICS Description: Refrigerated Warehousing and Storage

Release Duration: 001 Hours 05 Minutes

Release Event

Gas Release: Yes
Liquid Spill/Evaporation: Yes

Fire: Explosion:

Uncontrolled/Runaway Reaction:

Release Source

Storage Vessel:

Piping:

Process Vessel: Transfer Hose:

Valve: Yes

Pump:

Joint:

Other Delegas Courses

Other Release Source: Leak occurred through a cracked factory weld internal to a Hansen HS4A valve's bonnet.

Weather Conditions at the Time of Event

Wind Speed: 6.0
Units: miles/h
Direction: NW
Temperature: 62
Atmospheric Stability Class: B

Precipitation Present:

Unknown Weather Conditions:

On-Site Impacts

Employee or Contractor Deaths: 0
Public Responder Deaths: 0
Public Deaths: 0
Employee or Contractor Injuries: 0
Public Responder Injuries: 0
Public Injuries: 0
On-Site Property Damage (\$): 0

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Known Off-Site Impacts

Deaths: 0
Hospitalization: 0
Other Medical Treatments: 0
Evacuated: 0
Sheltered-in-Place: 0
Off-Site Property Damage (\$): 0

Environmental Damage

Fish or Animal Kills:

Tree, Lawn, Shrub, or Crop Damage:

Water Contamination: Soil Contamination:

Other Environmental Damage: Release to atmosphere only.

Initiating Event

Initiating Event: Equipment Failure

Contributing Factors

Equipment Failure: Yes

Human Error:

Improper Procedures: Overpressurization: Upset Condition: By-Pass Condition:

Maintenance Activity/Inactivity:

Process Design Failure:
Unsuitable Equipment:
Unusual Weather Condition:
Management Error:
Other Contributing Factor:

Off-Site Responders Notified

Off-Site Responders Notified: No, not notified

Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment:

Revised Maintenance:

Revised Training: Yes

Revised Operating Procedures:

New Process Controls: New Mitigation Systems:

Revised Emergency Response Plan: Yes

Changed Process: Reduced Inventory:

None:

Other Changes Introduced: Additional Detail: Training and enforcement of SOP

and emergency escalation procedures.

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Confidential Business Information

CBI Claimed:

Chemicals in Accident History

Accident Chemical ID: 11203

Quantity Released (lbs): 217

Percent Weight: 100.0

Chemical Name: Ammonia (anhydrous)

CAS Number: 7664-41-7 Flammable/Toxic: Toxic

Accident History ID: 1000007000

Date of Accident: 07-May-2007

Time Accident Began (HHMM): 1107
NAICS Code of Process Involved: 49312

NAICS Description: Refrigerated Warehousing and Storage

Yes

Release Duration: 004 Hours 52 Minutes

Release Event

Gas Release: Yes Liquid Spill/Evaporation: Yes

Fire: Explosion:

Uncontrolled/Runaway Reaction:

Release Source

Storage Vessel:

Piping:

Process Vessel: Transfer Hose:

Valve:

Pump: Joint:

Other Release Source:

Weather Conditions at the Time of Event

Wind Speed:

Units:

Direction: Temperature:

Atmospheric Stability Class: Precipitation Present:

Unknown Weather Conditions: Yes

On-Site Impacts

Facility Name: Shamrock AS/RS Warehouse Distribution Center EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220 0 Employee or Contractor Deaths: 0 Public Responder Deaths: Public Deaths: 0 Employee or Contractor Injuries: 1 Public Responder Injuries: 0 Public Injuries: 0 On-Site Property Damage (\$): 1000000 **Known Off-Site Impacts** Deaths: 0 Hospitalization: 0 Other Medical Treatments: 0 Evacuated: 0 Sheltered-in-Place: 0 Off-Site Property Damage (\$): 0 **Environmental Damage** Fish or Animal Kills: Tree, Lawn, Shrub, or Crop Damage: Water Contamination: Soil Contamination: Other Environmental Damage: **Initiating Event** Initiating Event: **Human Error Contributing Factors** Equipment Failure: Human Error: Yes Improper Procedures: Overpressurization: **Upset Condition:** By-Pass Condition: Maintenance Activity/Inactivity: Yes Process Design Failure: Unsuitable Equipment: **Unusual Weather Condition:** Management Error: Other Contributing Factor: Visual Conditions in area due to leak Off-Site Responders Notified Notified and Responded Off-Site Responders Notified: Changes Introduced as a Result of the Accident Improved or Upgraded Equipment: Revised Maintenance: Revised Training: Yes **Revised Operating Procedures:** Yes

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

New Process Controls:

New Mitigation Systems: Yes Revised Emergency Response Plan: Yes

Changed Process: Reduced Inventory:

None:

Tagging, Photographic website, virtual tours, Coordination and training for and with the Fire Departement HazMat Team Other Changes Introduced:

Confidential Business Information

CBI Claimed:

Chemicals in Accident History

Accident Chemical ID: 1000005609

Quantity Released (lbs): 4996 Percent Weight: 100.0

Chemical Name: Ammonia (anhydrous)

CAS Number: 7664-41-7 Flammable/Toxic: Toxic

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 7. Program Level 3

Description

Shamrock AS/RS Warehouse has developed and implemented a Program 3 Prevention Program for it's three refrigeration systems located onsite. Program 3 elements includes the following:

- Process Safety Information
- Process Hazard Analysis
- Operating Procedures
- Training
- Mechanical Integrity
- Management of Change
- Pre-Startup Review
- Compliance Audits
- Incident Investigation
- Employee Participation
- Hot Work Permit
- Contractors

The Prevention Program was developed using recommended guideline of 29 CFR 1910.119, 29 CFR 1910.38 Emergency Responce Planning and other relevant regulations, and Best Management Practices.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID: 1000010217

Chemical Name: Ammonia (anhydrous)

Flammable/Toxic: Toxic
CAS Number: 7664-41-7

Prevention Program Level 3 ID: 1000008816 NAICS Code: 49312

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

01-Nov-2006

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

01-Nov-2006

The Technique Used

What If: Checklist:

What If/Checklist: Yes

HAZOP:

Failure Mode and Effects Analysis:

Fault Tree Analysis:

Other Technique Used: What If and Guide Words

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

01-Nov-2007

Major Hazards Identified

Toxic Release: Yes

Fire:

Yes Explosion:

Runaway Reaction: Polymerization:

Overpressurization: Yes Yes Corrosion: Overfilling: Yes Contamination: Yes **Equipment Failure:** Yes

Loss of Cooling, Heating, Electricity, Instrument Air: Yes

Earthquake:

Floods (Flood Plain):

Tornado: Hurricanes:

Other Major Hazard Identified: Terrorism, Disgruntled Emoloyee, Vandalism and

sabotage

Process Controls in Use

Vents: Yes Relief Valves: Yes Check Valves: Yes Scrubbers: Yes

Flares:

Manual Shutoffs: Yes Automatic Shutoffs: Yes Interlocks: Yes Alarms and Procedures: Yes

Keyed Bypass:

Emergency Air Supply: Yes Yes **Emergency Power:** Backup Pump: Yes Grounding Equipment: Yes

Inhibitor Addition: Rupture Disks:

Excess Flow Device: Yes Quench System: Yes Purge System: Yes

None:

Other Process Control in Use:

Mitigation Systems in Use

Sprinkler System: Yes

Dikes:

Fire Walls: Yes

Blast Walls: Deluge System: Water Curtain:

EPA Facility Identifier: 1000 0004 3106

Enclosure: Yes Neutralization: Yes

None:

Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors: Yes

Perimeter Monitors:

None:

Other Monitoring/Detection System in Use: Alarm sensors and Monitor Devices

Changes Since Last PHA Update

Reduction in Chemical Inventory:

Increase in Chemical Inventory: Yes

Change Process Parameters: Installation of Process Controls:

Installation of Process Detection Systems: Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update: Change in mitigation system

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 01-Feb-2009

Training

Training Revision Date (The date of the most recent 01-Feb-2009 review or revision of training programs):

The Type of Training Provided

Classroom: Yes On the Job: Yes

Other Training:

The Type of Competency Testing Used

Written Tests: Yes
Oral Tests: Yes
Demonstration: Yes
Observation: Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of 01-Feb-2009 the most recent review or revision of maintenance procedures):

Plan Sequence Number: 1000009220

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Equipment Inspection Date (The date of the most

recent equipment inspection or test):

30-Nov-2008

Equipment Tested (Equipment most recently inspected or tested):

Meatplant Cooling Tower

Management of Change

Change Management Date (The date of the most 01-Jan-2009 recent change that triggered management of change procedures):

Change Management Revision Date (The date of 01-Feb-2009 the most recent review or revision of management of change procedures):

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

01-May-2009

Compliance Audits

Compliance Audit Date (The date of the most recent 01-Nov-2006 compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 01-Nov-2007

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

21-May-2007

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

21-May-2008

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

01-Jun-2009

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 01-Jan-2009 recent review or revision of hot work permit procedures):

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

01-Jun-2009

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

30-Oct-2008

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

Confidential Business Information

CBI Claimed:

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 8. Program Level 2

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Yes

Facility Plan (Does facility have its own written emergency response plan?):

Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Yes

Healthcare (Does facility's ER plan include information on emergency health care?):

Yes

Emergency Response Review

Review Date (Date of most recent review or update 01-Dec-2008 of facility's ER plan):

Emergency Response Training

Training Date (Date of most recent review or update 01-Jul-2008 of facility's employees):

Local Agency

Agency Name (Name of local agency with which the Phoenix Fire Department facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(602) 262-6297

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes
OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52: OPA 90 Regulations at 40 CFR 112, 33 CFR 154,

49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify): OSHA 1910.119

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

Executive Summary

1. Accidental release prevention and emergency response policies:

Ammonia is one of the most prevalent extremely hazardous substances. Ammonia is one of the ten hazardous chemicals most commonly involved in a release. To prevent and mitigate an Ammonia release, to improve facility safety, and benefit the community and the environment, Shamrock Foods Company has developed policies and programs to prevent an accidental release. They include management commitment to safety, risk management plans, standard operating procedures, safety programs, preventative maintenance programs, contractor safety, and training. The most common causes of an Ammonia release are related to Operations and Maintenance failures, Equipment Failures and/or Process Failures; consequently Shamrock Foods Company has emphasized preventative maintenance, scheduling replacement of parts such as valves and gaskets, and training of maintenance employees in safe operations.

An Emergency Action Plan has been submitted to the Maricopa County Local Emergency Planning Committee. All employees are trained on relevant response procedures. There are written procedures for the use, inspection, maintenance and testing of emergency response equipment. The plan also includes evacuation routes, protective actions for uninvolved employees, a method of accounting for employees, and a list of personal protective equipment for response and mitigation equipment. The Emergency Action Plan also includes a procedure for informing the public and emergency response agencies in case of a release.

2. The stationary source and regulated substances handled.

The Shamrock AS/RS Distribution Center is located at 2929 West Virginia Phoenix, Arizona,

The regulated substance handled at this distribution facility is anhydrous ammonia. There is approximately 65,390 lbs. of Ammonia on site seperated into three refrigeration systems. Ammonia is considered an Acutely Hazardous Material and the amount maintained on site by Shamrock AS/RS Distribution Center exceeds the Threshold Planning Quantity (TPQ) of 10000 lbs.

3. The worst-case release scenario(s) and the alternative release scenario(s), including administrative controls and mitigation measures to limit the distances for each reported scenario.

Worst-Case Scenario - The Worst Case Scenario for Shamrock AS/RS Distribution Center is a 10 minute release of 36,190 lbs. of Ammonia from the largest vessel, high pressure receiver, from the largest system.

The distance to the endpoint of 200 ppm ERPG-2 Type for the worst-case scenario is 2.3 Miles. The release would extend beyond the property boundary.

Alternative Scenario - The RMP regulations require that an alternate scenario be determined that is more likely to occur than the worst case scenario. The alternate release is also required to reach an endpoint offsite, unless no such scenario exists. Shamrock Foods Company, in the HazOp study conducted to satisfy the Risk Management and Prevention Program, identified a "most likely" scenario as a 3,960 lbs released from a ruptured, leaking, or vandalised pipe over 10 minutes. This release scenario satisfies the criteria for the Alternate Toxic Gas Release.

The distance to the endpoint of 200 ppm ERPG-2 Type for the alternate case scenario is 0.2 miles. This release would extend beyond the facility boundary.

All employees are trained on relevant response procedures. There are written procedures for the use, inspection, maintenance and testing of emergency response equipment. The plan also includes evacuation routes, protective actions for uninvolved employees, a method of accounting for employees, and a list of personal protective equipment for response and mitigation equipment.

4. The general accidental release prevention program and the specific prevention steps.

This accidental release prevention program uses recommended guidelines of the International Institute of Ammonia, applicable state codes and federal regulations. All maintenance employees will be trained in Ammonia refrigeration systems. Shamrock AS/RS Distribution Center has developed a prevention program that includes safety information, a Hazard and Operability Study, operating procedures, training, maintenance, compliance audits and incident investigations.

EPA Facility Identifier: 1000 0004 3106 Plan Sequence Number: 1000009220

5. Five-year accidental history.

AS/RS Distribution Center has had one accidental release involving Ammonia during the last 5 years at this facility. The Ammonia accident involved a 1/4" angle valve with a plug and an ammonia systems service worker. The incident occurred on May 7, 2007 at 11:00am. Approximately 4,996 lbs was release over the 4hr 52min duration of the accident before being controlled by the Hazmat unit of the Phoenix Fire Department.

6. The emergency response program.

In addition to the Emergency Action Plan described in paragraph 1, plans for evacuation to ensure that the evacuation procedure is adequately addressed and the needs for drills will be assessed. This emergency response program was established in accordance with 29 CFR 1910.38(a) and includes procedures for handling small releases.

7. Planned changes to improve safety.

This facility is in the process of conducting an independent audit to ensure that all elements of the program are being met as required and documented.